



COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 13-6

March 04, 2014

Investigation by the Department on its Own Motion to Determine whether an Agreement entered into by Verizon New England Inc., d/b/a Verizon Massachusetts is an Interconnection Agreement under 47 U.S.C. § 251 Requiring the Agreement to be filed with the Department for Approval in Accordance with 47 U.S.C. § 252

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE SECOND SET OF INFORMATION REQUESTS TO VERIZON NEW ENGLAND INC., D/B/A VERIZON MASSACHUSETTS

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable ("Department") makes the following information requests to Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon MA").

Instructions and Definitions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. Unless otherwise stated, each request should be answered in writing on a separate three-hole punch page including: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as soon as they are completed.
3. Requests shall be deemed continuing so as to require further supplemental responses if Verizon MA and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. If any of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
5. The responses should be served in accordance with the Ground Rules to this proceeding, as written in the PROCEDURAL SCHEDULE AND NOTICE, issued on November 29, 2013.

6. The term “provide complete and detailed documentation” means: Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates.
7. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. The term “certify” means to provide a sworn certification by the appropriate corporate officer.
9. The term “IP” means Internet Protocol.
10. The term “TDM” means Time-Division Multiplexing.
11. The term “VoIP” means Voice over Internet Protocol.
12. The term “FiOS Digital Voice” refers to Verizon’s interconnected VoIP service.
13. The term “Verizon” refers to Verizon Communications, Inc. and any entity that is an affiliate of Verizon Communications, Inc. including Verizon MA.
14. The term “affiliate” is any individual, partnership, association, joint stock company, trust, corporation, or other entity who (or that), directly or indirectly, owns or controls, is owned or controlled by, or is under common ownership or control with, Verizon Communications, Inc.
15. The term “Verizon MA” refers to Verizon New England Inc., d/b/a Verizon Massachusetts.

REQUESTS

- D.T.C. 2-1 Referring to Page 2, Lines 17-19 of the Rebuttal Testimony of Eugene J. Spinelli, Sherri D. Schlabs, and Paul B. Vasington on behalf of Verizon MA, in which Verizon MA states, “and Mr. Burt’s statement is not true with respect to today’s VoIP marketplace, in which no provider has marketpower”:
- A. Provide a detailed description of Verizon MA’s “VoIP Market” including, but not limited to geographic boundaries, competitors, available products, substitute product, available services, substitute services, infrastructure, suppliers, classes of customers, levels of economic activities, estimated monetary value, and market shares.
 - B. Explain in detail how the VoIP market relates to the market for:
 - 1. voice communications services; and
 - 2. traditional TDM telecommunications services.
- D.T.C. 2-2 Referring to Page 6, Line 5 - Page 9, Line 4, of the Direct Testimony of Eugene J. Spinelli, Sherri D. Schlabs, and Paul B. Vasington on behalf of Verizon MA, describing Verizon’s FiOS Digital Voice Service:
- A. Provide complete and detailed documentation supporting the contention that the intertwining of communications platforms and the integration of additional functions with voice communications is a factor affecting consumers’ purchasing decisions for voice communications services.
 - B. Provide complete and detailed documentation supporting the contention that the availability of an underlying IP network over a traditional TDM network is a factor affecting consumers’ purchasing decisions for voice communications services.